

MICHAEL C. ORMSBY  
United States Attorney  
Eastern District of Washington  
Stephanie A. Van Marter  
Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

UNITED STATES DISTRICT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA.

4:15-CR-6049-EFS

Plaintiff,  
vs.

SECOND SUPERSEDING  
INDICTMENT

JESE DAVID CARILLO CASILLAS,  
ROSA ARACELI GRANADOS (a.k.a. La  
China),

Vio: 21 U.S.C. § 846  
Conspiracy to Distribute 500  
Grams or More of a Mixture or  
Substance Containing a  
Detectable Amount of  
Methamphetamine, 5 Kilograms  
or More of Cocaine, 1 Kilogram  
or More of Heroin and 400 grams  
or More of N-phenyl-N  
Propanamide  
(Count 1)

FRANCISCO DUARTE FIGUEROA,  
GABRIELA MENDOZA VASQUEZ,

Vio: 18 U.S.C. § 1956(h)  
Conspiracy to Commit Money  
Laundering (Count 2)

BRITTNEY LEE ZARAGOZA,  
SALVADOR GUDINO CHAVEZ.

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(ii)  
Possession with the Intent to  
Distribute 5 Kilograms or more of  
Cocaine (Count 3)

JUVENAL LANDA SOLANO,  
ERICA MARIA SOLIS,  
EDGAR OMAR HERRERA FARIAS,  
(a.k.a. Burro).

1  
2 [REDACTED]  
3 JUAN BRAVO ZAMBRANO,  
4 [REDACTED]  
5 [REDACTED]  
6 JOSE ADRIAN MENDOZA, and  
7 VERONICA ELVIRA CORTEZ,  
8  
9  
10 Defendants.  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Vio: 18 U.S.C. § 1956(a)(1)(B)(i)  
Money Laundering  
(Counts 4, 5, 6, 7, 10, 11, 12, 14)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii)  
Possession with the Intent to  
Distribute 50 grams or more of  
Actual Methamphetamine  
(Count 8)

Vio: 18 U.S.C. 1956(a)(1)(B)(i)  
International Money Laundering  
(Counts 9, 13)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(i), (vi)  
Possession with the Intent to  
Distribute 1 Kilogram or More of  
a Mixture or Substance  
Containing Heroin and  
400 grams or More of a Mixture  
or Substance Containing N-  
phenyl-N Propanamide  
(Count 15)

Notice of Criminal Forfeiture  
Allegations

The Grand Jury Charges:

## **COUNT ONE**

Beginning on a date unknown but by on or about January 2010 continuing  
until on or about December 6, 2016, in the Eastern District of Washington and  
elsewhere, the Defendants, JESE DAVID CARILLO CASILLAS, ROSA

**SECOND SUPERSEDING INDICTMENT – 2**

Second Superseding.Indictment.docx

1 ARACELI GRANADOS (a.k.a. La China), [REDACTED]

2 [REDACTED], FRANCISCO DUARTE

3 FIGUEROA, GABRIELA MENDOZA VASQUEZ, [REDACTED]

4 [REDACTED] SALVADOR GUDINO

5 CHAVEZ, [REDACTED] JUVENAL LANDA, ERICA

6 MARIA SOLIS, EDGAR OMAR HERRERA FARIAS (a.k.a. Burro), [REDACTED]

7 [REDACTED], JUAN BRAVO ZAMBRANO, [REDACTED]

8 [REDACTED], JOSE ADRIAN MENDOZA, and VERONICA ELVIRA CORTEZ,

9 did knowingly and intentionally combine, conspire, confederate and agree together

10 with each other and other persons, both known and unknown to the Grand Jury, to

11 commit the following offense against the United States, to wit: distribution of 500

12 grams or more of a mixture or substance containing a detectable amount of

13 Methamphetamine, 5 kilograms or more of a mixture or substance containing a

14 detectable amount of Cocaine, 1 kilograms or more of a mixture or substance

15 containing a detectable amount of heroin and 400 grams or more of a mixture or

16 substance containing a detectable amount of N-phenyl-N Propanamide, all

17 Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1),

18 (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in violation of 21 U.S.C. § 846.

19 SECOND SUPERSEDING INDICTMENT – 3

20 Second Superseding.Indictment.docx

## COUNT TWO

Beginning on a date unknown but by on or about January 2010 continuing until present time, in the Eastern District of Washington and elsewhere, the Defendants, JESE DAVID CARILLO CASILLAS, GABRIELA MENDOZA VASQUEZ, [REDACTED], BRITTNEY LEE ZARAGOZA, SALVADOR GUDINO CHAVEZ, [REDACTED] and [REDACTED] others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to commit certain money laundering offenses under 18 U.S.C. § 1956, as follows:

(1956(a)(1))

The Defendants named in this count: did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, and transactions involving the use of a financial institution which is engaged in and affects interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the property involved in the financial transactions represents the proceeds of some form of unlawful activity, knowing that the transactions are designed in whole or in part to

1 conceal and disguise the nature, the location, the source, the ownership, and the  
2 control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C.  
3 § 1956(a)(1)(B)(i); and

5 **(1956(a)(2))**  
6

7 The Defendants named in this count: did transport, transmit, and transfer,  
8 and attempt to transport, transmit, and transfer a monetary instrument and funds  
9 from a place in the United States to and through a place outside the United States  
10 with the intent to promote the carrying on of specified unlawful activity, that is,  
11 conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§  
12 841(a)(1), (b)(1)(A), and 846; in violation of 18 U.S.C. § 1956(a)(2)(A).  
13

15 The Grand Jury further alleges this offense was committed during and in  
16 furtherance of the conspiracy charged in Count One, above.  
17

18 All in violation of 18 U.S.C. § 1956(h).  
19

20 **COUNT THREE**  
21

22 On or about August 20, 2014, in the Eastern District of Washington, the  
23 Defendant, ERICA MARIA SOLIS, did knowingly and intentionally possess with  
24 intent to distribute 5 kilograms or more of mixture or substance containing a  
25 detectable amount of cocaine, a schedule II controlled substance, in violation of 21  
26 U.S.C. § 841(a)(1), (b)(1)(A)(ii), and 18 U.S.C. § 2.  
27

28 **SECOND SUPERSEDING INDICTMENT – 5**

Second Superseding.Indictment.docx

## COUNT FOUR

On or about April 22, 2015, and continuing until on or about April 27, 2015, in the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of US currency to a Wells Fargo account in the name of JESE CASILLAS located in Kennewick, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$8000 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

## COUNT FIVE

On or about November 24, 2015, and continuing until on or about December 14, 2015, in the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money

1 wire transfer of U.S. currency to a Wells Fargo account in the name of JESE  
2 CASILLAS located in Kennewick, Washington; which involved the proceeds of a  
3 specified unlawful activity, that is conspiracy to distribute and the distribution of  
4 controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846,  
5 knowing that the transaction was designed in whole or in part to conceal and  
6 disguise the nature, the location, the source, the ownership, and the control of the  
7 proceeds of the specified unlawful activity, and that while conducting and  
8 attempting to conduct such financial transaction knew that the property involved in  
9 the financial transaction, that is funds in the amount of \$5,000 represented the  
10 proceeds of some form of unlawful activity in violation of 18 U.S.C. §§  
11 1956(a)(1)(B)(i), and 2.  
12

## **COUNT SIX**

18 On or about December 2, 2015, and continuing until on or about December  
19 5, 2015, in the Eastern District of Washington and elsewhere, the Defendant,  
20 GABRIELA MENDOZA VASQUEZ, did conduct and attempt to conduct a  
21 financial transaction affecting interstate and foreign commerce, to wit: a money  
22 wire transfer of U.S. currency to a Bank of America account in the name of  
23 Gabriela Mendoza located in Pasco, Washington; which involved the proceeds of a  
24 specified unlawful activity, that is conspiracy to distribute and the distribution of  
25 controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846,  
26

**SECOND SUPERSEDING INDICTMENT – 7**

Second Superseding.Indictment.docx

1 knowing that the transaction was designed in whole or in part to conceal and  
2 disguise the nature, the location, the source, the ownership, and the control of the  
3 proceeds of the specified unlawful activity, and that while conducting and  
4 attempting to conduct such financial transaction knew that the property involved in  
5 the financial transaction, that is funds in the amount of \$6,000 represented the  
6 proceeds of some form of unlawful activity in violation of 18 U.S.C. §§  
7 1956(a)(1)(B)(i), and 2.  
8

9  
10 **COUNT SEVEN**

11  
12 On or about December 2, 2015, and continuing until on or about December  
13 8, 2015, in the Eastern District of Washington and elsewhere, the Defendant, JESE  
14 DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial  
15 transaction affecting interstate and foreign commerce, to wit: a money wire  
16 transfer of U.S. currency to a Wells Fargo account in the name of Jese Casillas  
17 located in Kennewick, Washington; which involved the proceeds of a specified  
18 unlawful activity, that is conspiracy to distribute and the distribution of controlled  
19 substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing  
20 that the transaction was designed in whole or in part to conceal and disguise the  
21 nature, the location, the source, the ownership, and the control of the proceeds of  
22 the specified unlawful activity, and that while conducting and attempting to  
23 conduct such financial transaction knew that the property involved in the financial  
24  
25  
26  
27  
28

**SECOND SUPERSEDING INDICTMENT – 8**

Second Superseding.Indictment.docx

1 transaction, that is funds in the amount of \$1,689.14 represented the proceeds of  
2 some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and  
3  
4 2.

5 **COUNT EIGHT**  
6

7 On or about January 6, 2016, in the Eastern District of Washington, the  
8 Defendants, JESE DAVID CARILLO CASILLAS and JUVENAL LANDA  
9 SOLANO, did knowingly and intentionally possess with intent to distribute 50  
10 grams or more of actual Methamphetamine, a Schedule II controlled substance, in  
11 violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), and 18 U.S.C. § 2.  
12  
13

14 **COUNT NINE**  
15

16 On or about March 1, 2016, and continuing until on or about March 14,  
17 2016, in the Eastern District of Washington and elsewhere, the Defendant, JESE  
18 DAVID CARILLO CASILLAS, did transport, transmit, and transfer, and attempt  
19 to transport, transmit, and transfer monetary funds, that is \$46,950 in Canadian  
20 Currency, from a place outside the United States that is Surrey, British Columbia  
21 Canada, to and through a place inside the United States, to wit: US currency wired  
22 to various accounts in the United States to include \$5,000 wired to a JP Morgan  
23 Chase account located in Kennewick, Washington, in the name of Daisy Camacho,  
24 with the intent to promote the carrying on of specified unlawful activity, that is,  
25 conspiracy to distribute and distribution of controlled substances, in violation of  
26  
27  
28

**SECOND SUPERSEDING INDICTMENT – 9**

1 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, in violation of 18 U.S.C. §§  
2 1956(a)(2)(A), and 2.  
3

4 **COUNT TEN**

5 On or about April 7, 2016, until or about April 13, 2016, in the Eastern  
6 District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO  
7 CASILLAS, did conduct and attempt to conduct a financial transaction affecting  
8 interstate and foreign commerce, to wit: the transfer, delivery and other disposition  
9 of \$244,350.00 in U.S. funds from and at the direction of JESE DAVID  
10 CARILLLO CASILLAS to [REDACTED]; which involved the  
11 proceeds of a specified unlawful activity, that is conspiracy to distribute and the  
12 distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1),  
13 (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part  
14 to conceal and disguise the nature, the location, the source, the ownership, and the  
15 control of the proceeds of the specified unlawful activity, and that while  
16 conducting and attempting to conduct such financial transaction knew that the  
17 property involved in the financial transaction, that is funds in the amount of  
18 \$244,350.00 represented the proceeds of some form of unlawful activity in  
19 violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.  
20  
21  
22  
23  
24  
25  
26  
27  
28

## COUNT ELEVEN

On or about May 17, 2016 and continuing until on or about May 18, 2016, in the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of U.S. funds to a Wells Fargo account in the name of Brittney Zaragoza located Kennewick, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$3,000 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

## COUNT TWELVE

On or about May 17, 2016 and continuing until on or about May 18, 2016, in the Eastern District of Washington and elsewhere, the Defendant, BRITTNEY LEE ZARAGOZA, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of U.S.

1 funds to a Wells Fargo account in the name of Brittney Zaragoza located in  
2 Kennewick, Washington; which involved the proceeds of a specified unlawful  
3 activity, that is conspiracy to distribute and the distribution of controlled  
4 substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing  
5 that the transaction was designed in whole or in part to conceal and disguise the  
6 nature, the location, the source, the ownership, and the control of the proceeds of  
7 the specified unlawful activity, and that while conducting and attempting to  
8 conduct such financial transaction knew that the property involved in the financial  
9 transaction, that is funds in the amount of \$3,000 represented the proceeds of some  
10 form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.  
11  
12  
13  
14  
15  
16

### **COUNT THIRTEEN**

17 On or about May 26, 2016, and continuing until on or about June 3, 2016, in  
18 the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID  
19 CARILLO CASILLAS, did transport, transmit, and transfer, and attempt to  
20 transport, transmit, and transfer monetary funds, that is \$225,070 in Canadian  
21 Currency, from a place outside the United States that is Surrey, British Columbia,  
22 Canada, to and through a place inside the United States, to wit: U.S. currency  
23 deposited and withdrawn in various accounts in the United States to include a  
24 Wells Fargo Account located in Kennewick, Washington, in the name of Brittney  
25 Zaragoza, with the intent to promote the carrying on of specified unlawful activity,  
26  
27  
28

1 that is, conspiracy to distribute and distribution of controlled substances, in  
2 violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, in violation of Title 18  
3 U.S.C. §§ 1956(a)(2)(A), and 2.

5  
6 **COUNT FOURTEEN**

7 On or about May 26, 2016, and continuing until on or about June 3, 2016, in  
8 the Eastern District of Washington and elsewhere, the Defendant, BRITTNEY  
9 LEE ZARAGOZA, did conduct and attempt to conduct a financial transaction  
10 affecting interstate and foreign commerce, to wit: a money wire transfer of U.S.  
11 currency to a Wells Fargo account in the name of Brittney Zaragoza located in  
12 Kennewick, Washington; which involved the proceeds of a specified unlawful  
13 activity, that is conspiracy to distribute and the distribution of controlled  
14 substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing  
15 that the transaction was designed in whole or in part to conceal and disguise the  
16 nature, the location, the source, the ownership, and the control of the proceeds of  
17 the specified unlawful activity, and that while conducting and attempting to  
18 conduct such financial transaction knew that the property involved in the financial  
19 transaction, that is funds in the amount of \$3,000 represented the proceeds of some  
20 form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

21  
22  
23  
24  
25  
26  
27  
28  
SECOND SUPERSEDING INDICTMENT – 13

Second Superseding.Indictment.docx

## COUNT FIFTEEN

On or about August 15, 2016, in the Eastern District of Washington, the Defendants, JESE DAVID CARILLO CASILLAS, FRANCISCO DUARTE FIGUEROA and [REDACTED], did knowingly and intentionally possess with intent to distribute approximately 10 kilograms of a substance which contained 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N Propanamide and 1 kilogram or more of a mixture or substance containing a detectable amount of Heroin, Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (vi) and 18 U.S.C. § 2.

## NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of  
21 U.S.C. § 846, JESE DAVID CARILLO CASILLAS, ROSA ARACELI  
GRANADOS (a.k.a. La China), [REDACTED]

FRANCISCO DUARTE FIGUEROA,

GABRIELA MENDOZA VASQUEZ,

, BRITTNEY LEE ZARAGOZA,

1 SALVADOR GUDINO CHAVEZ, [REDACTED]

2 [REDACTED], JUVENAL LANDA SOLANO,

3 ERICA MARIA SOLIS, EDGAR OMAR HERRERA FARIAS (a.k.a. Burro),

4 [REDACTED]  
5 [REDACTED] JUAN BRAVO ZAMBRANO, [REDACTED]

6 [REDACTED] JOSE ADRIAN

7 MENDOZA, and VERONICA ELVIRA CORTEZ, and, shall forfeit to the United

8 States of America, any property constituting, or derived from, any proceeds

9 obtained, directly or indirectly, as the result of such offense(s) and any property

10 used or intended to be used, in any manner or part, to commit or to facilitate the

11 commission of the offense(s).

12 If any forfeitable property, as a result of any act or omission of the

13 Defendants:

14 (a) cannot be located upon the exercise of due diligence;

15 (b) has been transferred or sold to, or deposited with, a third party;

16 (c) has been placed beyond the jurisdiction of the court;

17 (d) has been substantially diminished in value; or

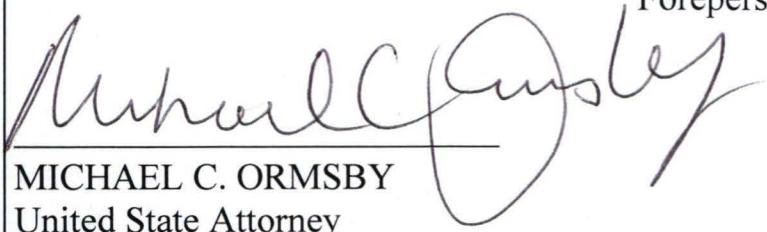
18 (e) has been commingled with other property which cannot be divided  
19 without difficulty;

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p).  
3

4 DATED this [REDACTED] day of December 2016.  
5

6 A TRUE BILL  
7

8 [REDACTED]  
9 Foreperson

10   
11 MICHAEL C. ORMSBY  
12 United State Attorney  
13

14   
15 Stephanie A. Van Marter  
16 Assistant United States Attorney  
17